

## Exhibit B

**UNITED STATES DISTRICT COURT**  
**SOUTHERN DISTRICT OF MISSISSIPPI**  
**NORTHERN DIVISION**

PHI THETA KAPPA HONOR SOCIETY,	)	
	)	
Plaintiff/Counter-Defendant	)	Civil Action No. 3:22-cv-00208-CWR-RPM
	)	
v.	)	
	)	
HONORSOCIETY.ORG, INC.,	)	
	)	
Defendant/Counter-Plaintiff	)	
/Third-Party-Plaintiff	)	
	)	
HONOR SOCIETY FOUNDATION, INC.,	)	
	)	
Defendant	)	
	)	
-----	)	
	)	
HONORSOCIETY.ORG, INC.,	)	
	)	
Defendant/Counter-Plaintiff	)	
/Third-Party-Plaintiff	)	
	)	
v.	)	
	)	
DR. LYNN TINCHER-LADNER,	)	
	)	
Third-Party Defendant	)	

**Declaration of Dr. Lynn Tinchler-Ladner**

I, Lynn Tinchler-Ladner, upon my personal knowledge, hereby submit this declaration pursuant to 28 U.S.C. § 1746 and declare as follows:

1. I am the President and CEO of Phi Theta Kappa Honor Society (“PTK”).
2. For over two years, PTK has been battling to protect its students – hundreds of students have reported confusion, including but not limited to students who have joined Honorsociety.org, Inc. (“Honor Society”) believing it to be PTK and demanding cancellations of

recurring credit card charges as well as students seeking PTK-member exclusive regalia and benefits, only to learn they are not members of PTK but instead members of Honor Society. In addition, many on-campus Phi Theta Kappa advisors have also reported complaints and instances of confusion among local PTK chapters, relaying that students have joined Honor Society believing it to be PTK, only to learn that it is not once they are hit with recurring credit card charges and/or unable to access PTK-member exclusive regalia and benefits.

3. But since approximately February 2024, when Magistrate Judge Ball retired and settlement discussions broke down, Honor Society has made a mission of destroying my professional reputation and irreparably damaging PTK's legacy.

4. Based on Honor Society's conduct, PTK had no other option but to seek not one but two injunctions to prohibit Honor Society and its Executive Director Michael Moradian from engaging in their malicious campaign against PTK and myself.

5. On April 5, 2024, I was made aware that Moradian had subtly threatened Dr. George Boggs, a PTK board member, with a PPP fraud investigation if PTK did not settle the case. At the time, Moradian's contact seemed to be an isolated incident, and PTK opted to ignore it.

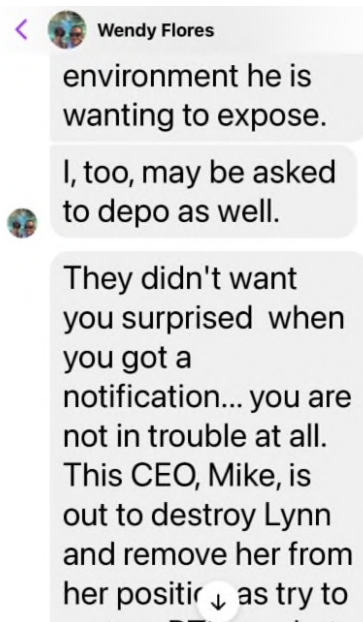
6. Beginning in May and continuing through October, I received a handful of messages from several ex-PTK employees friendly to PTK either directly or through current PTK employees that Moradian was reaching out by phone, text message, and/or social media to request information about PTK while alleging PTK was abusing its students and employees. Again, these communications appeared to be few and far between (as did any responses to Moradian), and PTK opted to ignore it.

7. Additionally, Moradian contacted two former International Student Officers from the 2013-2014 school year. And although Moradian's efforts to involve these two former PTK

International Officers were troubling, any prior issues these two individuals had with PTK were long in the past and not relevant to any party's claims or counterclaims, so again, PTK opted to ignore the communications.

8. But on or about November 15, I received a communication from Paige Rakestraw, a former PTK employee, that I found extremely troubling. Rakestraw notified me that two other former PTK employees – Wendy Flores and Erin Cogswell – had been contacting her in their attempt to assist Honor Society in this litigation. Rakestraw provided me with screenshots of those communications, which are attached as Exhibits B-1 and B-2, respectively.

9. In particular, I found the communications with Wendy Flores most troubling. According to Flores, Moradian was “out to destroy Lynn and remove her from her position”:



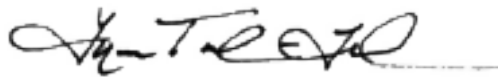
Ex. B-1, PTK0327326.

10. Despite Moradian's sworn testimony otherwise, Flores' statements do not surprise me. From my personal experience in this case, Moradian has made it his personal campaign to ruin my reputation and see me terminated. Unless Moradian's claims are dismissed, I believe he will

continue his malicious attacks on my character and reputation until he sees me removed from my position with PTK.

I verify under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed on December 31st, 2024.

A handwritten signature in black ink, appearing to read "Lynn Tincher-Ladner", written over a horizontal line.

Lynn Tincher-Ladner, Ph.D.

# **EXHIBIT B-1**



Wendy Flores

NOV 13 AT 6:07 PM


Hey Paige! I am so happy to see you doing happy! You are the BEST mom and stepmom EVER!!!



I was asked to reach out to you to let you know that the attorneys for the CEO of the Honor Society th ↓ is suing

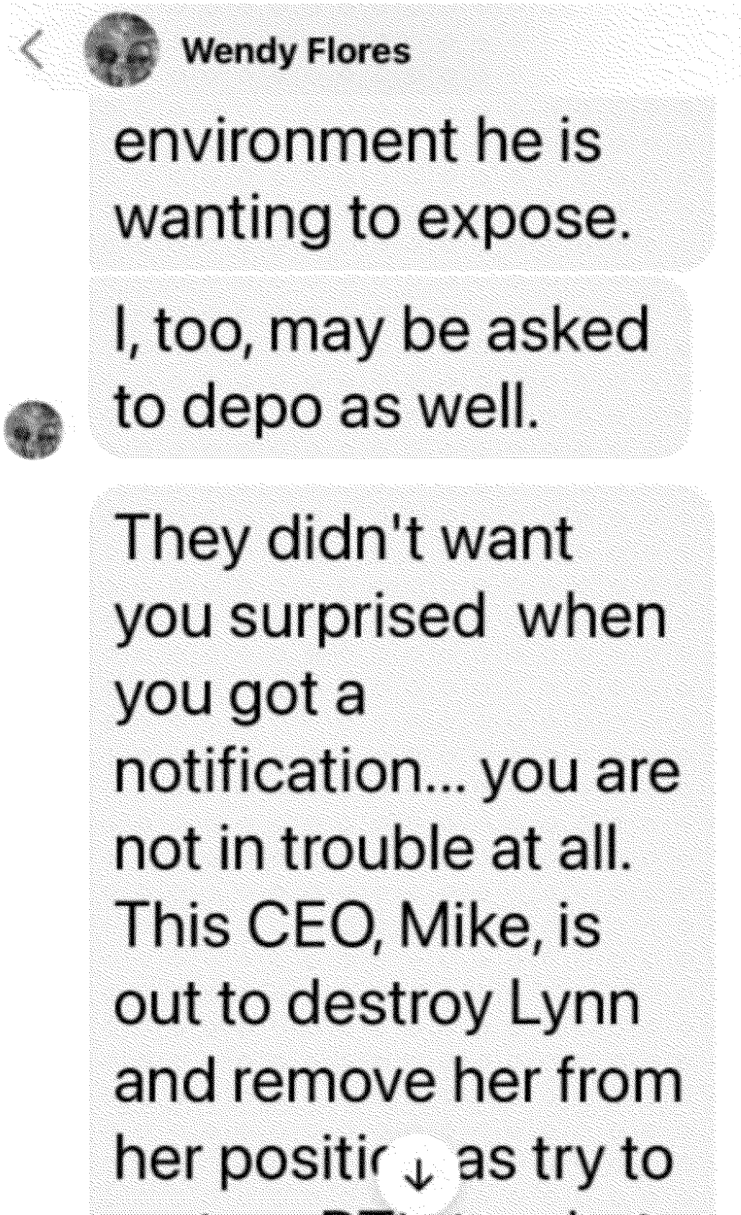
PTK0327324



<  Wendy Flores

Society that is suing  
Lynn and PTK is  
going to potentially  
send you a request  
for a deposition  
about your time at  
PTK. It seems your  
name has been  
brought up and that  
you may have  
helpful information. I  
believe, but am not  
certatin, that this is  
pertaining to the  
toxic workplace





< Wendy Flores  
restore PTK to what  
it used to be.



NOV 13 AT 6:43 PM

Got it. Thanks for the  
heads up!! Glad to  
see you are doing  
well, too. ❤️

NOV 13 AT 7:21 PM

Can you provide an  
email address for me  
to give them?

I don't think I want to

  **Wendy Flores**  
email address for me  
to give them?

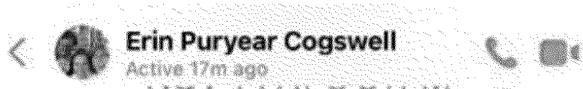
I don't think I want to  
get involved. I do t  
have anything to  
add because I  
worked from home  
and was removed  
from a lot of the  
work environment.

NOV 13 AT 10:46 PM

 I totally understand!

## **EXHIBIT B-2**





Hey there! This is so random, but have you heard from Mike Moradian, the director of honor society.org? He's trying to reach you re: a lawsuit he's filed against PTK.

He said you're going to be deposed next week — not sure if you knew that.

Apparently someone gave him your name and said you might "know a lot that would be helpful" to

